

# Exhibit 10

**In the Matter Of:**

*UNITED STATES OF AMERICA v*

*GOOGLE, LLC*

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*NEAL MOHAN*

*October 30, 2023*

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF VIRGINIA  
3 ALEXANDRIA DIVISION

4 - - -

5 UNITED STATES OF : CASE NO.  
6 AMERICA, et al., : 1:23-cv-00108  
: -LMB-JFA  
7 Plaintiffs, :  
:   
8 v. :  
:   
9 GOOGLE, LLC, :  
:   
10 Defendant. :

11 - HIGHLY CONFIDENTIAL -

12 - - -

13 October 30, 2023

14 - - -

15  
16 Videotaped deposition of  
17 NEAL MOHAN, taken pursuant to notice, was  
18 held at the law offices of Axinn, Veltrop  
19 & Harkrider, LLP, 1901 L Street NW,  
20 Washington, D.C., beginning at 8:35 a.m.,  
on the above date, before Michelle L.  
Gray, a Registered Professional Reporter,  
Certified Court Reporter, Certified  
Realtime Reporter, and Notary Public.

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1           said, I believe it does.

2       BY MR. LONGMAN:

3           Q.     Okay.

4           A.     But I'm -- but I'm not --  
5       again, I don't know what exactly the  
6       details of that setting.

7           Q.     Okay. Do you know whether  
8       it has -- it -- the default setting is to  
9       set history on or off?

10           MR. BITTON: Objection to  
11       form.

12           THE WITNESS: I do not know  
13       what the default is.

14       BY MR. LONGMAN:

15           Q.     Okay. Have you ever turned  
16       history off when you engaged in a chat  
17       for business purposes?

18           MR. BITTON: Objection to  
19       form.

20           THE WITNESS: I mean,  
21       generally speaking, as you can  
22       tell from my answers, because I  
23       don't really think about the  
24       settings in Google Chat that

1 much, I probably went with  
2 whatever the default was.

3 BY MR. LONGMAN:

4 Q. All right. Let's do some  
5 definitions.

6 Are you familiar with the  
7 term "display advertising"?

8 A. I am familiar with that  
9 term, yes.

10 Q. How would you define display  
11 advertising?

12 A. I think it -- the way I  
13 would think about it is it's -- it's all  
14 advertising, broadly speaking, that runs  
15 on websites, on mobile apps, on social  
16 media platforms, on commerce sites. All  
17 of these different digital platforms.  
18 And it can take the form of image ads,  
19 video ads, interactive ads.

20 It's kind of, in my mind, a  
21 very broad space that publishers and  
22 advertisers engage in, in the digital  
23 realm. It's really -- it's all -- it's  
24 all in the digital realm, typically.